

REED SMITH LLP
Formed in the State of Delaware
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American Home Mortgage Servicing, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY – CAMDEN VICINAGE

-----X	
JOHN W. OLIVER, III	:
Individually and as a class	:
representative on behalf of others	:
similarly situated	:
	:
Plaintiff,	:
	:
v.	:
	:
AMERICAN HOME MORTGAGE	:
SERVICING, INC.; AND JOHN	:
DOE SERVICERS 1-100 AND	:
JOHN DOE LAW FIRMS 1-10,	:
	:
Defendants.	:
	:
	:
	:
-----X	

Civil Action No: 1:09-cv-00001-NLH-JS

Motion Return Date: April 6, 2009

**DEFENDANT AMERICAN
HOME MORTGAGE
SERVICING, INC.'S NOTICE OF
MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

TO: Lewis G. Adler, Esquire
26 Newton Avenue
Woodbury, NJ 08096
Attorneys for Plaintiff, John W. Oliver, III

PLEASE TAKE NOTICE THAT on *Monday, the 6th of April, 2009, at 9:00 a.m.*, or as soon thereafter as counsel may be heard, Reed Smith LLP, counsel for Defendant American Home Mortgage Servicing, Inc. shall move before the Honorable Noel L. Hillman, U.S.D.J., at the Federal District Court for the District of New Jersey located at Mitchell H. Cohen U.S. Courthouse, 1 John F. Gerry Plaza, Camden, New Jersey, 08101, for an order dismissing Plaintiff's Complaint in the above-captioned matter for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6) and other grounds as set forth within the moving papers.

Please take further notice that in support of this motion, American Home shall rely upon its Brief in Support of the Motion to Dismiss and the Certification of Diane Bettino, Esq. (with attachments) filed contemporaneously herewith. A proposed form of Order is enclosed. Oral argument is respectfully requested.

REED SMITH LLP
Attorneys for Defendant

/s/
Diane A. Bettino

Dated: March 13, 2009